

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOHN ALEXANDER and
BRAULIA ALEXANDER,

Plaintiffs,

Case No: 07 CV 6441 (RJS)

- against -

AMCHEM PRODUCTS, INC., et al.,

Defendants.

AFFIDAVIT

-----X
STATE OF NEW YORK)
 ss.:
COUNTY OF NEW YORK)


ELLIOTT J. ZUCKER, an attorney duly admitted to practice law before the courts of the state of New York, hereby affirms under the penalties of perjury and upon information and belief as follows:

1. I am a member of the law firm of AARONSON RAPPAPORT FEINSTEIN & DEUTSCH, LLP, the attorneys for defendants FORD MOTOR COMPANY and GENERAL MOTORS CORPORATION in the above-captioned litigation.

2. This affidavit is made in opposition to the plaintiffs' motion to remand this matter back to state court.

3. For the reasons articulated in the accompanying memorandum of law, it is respectfully requested that the plaintiffs' motion be denied in its entirety.

Dated: New York, New York
November 2, 2007


ELLIOTT J. ZUCKER (EJZ8664)

Sworn to before me this
2nd day of November, 2007


NOTARY PUBLIC

RUTH A TIERNEY
Notary Public, State of New York
No. 01TI4898922
Qualified in Queens County
Commission Expires June 22, 2011